

DUNNEGAN & SCILEPPI LLC
William Dunnegan
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Attorneys for Plaintiff

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
BICOM NY, LLC, <i>et al.</i> ,	:	Case No. 17-11906 (MEW)
Debtors,	:	(Jointly Administered)

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CRAIG R. JALBERT, in his capacity as the	:	
Liquidation Trustee of the Liquidation Trust	:	
created pursuant to the Confirmed Revised	:	
Second Amended Joint Plan of Liquidation of	:	
the Debtors and Debtors-In-Possession and the	:	
Official Committee of Unsecured Creditors,	:	
Plaintiff,	:	
-against-	:	Adversary Proceeding No. 19-1315
GARY FLOM, VENAMIN NILVA,	:	
ALEXANDER BOYKO and	:	
BNF PARTNERS NY LLC,	:	
Defendants.	:	

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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed declaration of William Dunnegan, sworn to September 7, 2021, and all prior proceedings in this action, plaintiff (the “Trustee”), will move this Court before the Honorable Michael E. Wiles, in Courtroom 617, at the United

States Bankruptcy Court for the Southern District of New York, located at One Bowling Green, New York, New York, 10004-1408, on September ___, 2021, at 10:00 a.m., or at such other time and place as the Court may direct, for an order:


(a) Pursuant to Bankruptcy Rule 7069, Federal Rule of Civil Procedure 69 and New York C.P.L.R. § 5225(a), compelling defendant Alexander Boyko (“Boyko”) to turnover to the Trustee forthwith cash or other personal property – including but not limited to his interests in (i) the company doing business as B2B Center and (ii) the limited partnership New Hampshire Ragged Mountain Resort Investment, L.P. – to satisfy the judgments entered against him in this proceeding, totaling \$1,226,203.60 (Dkts. 95, 96 and 97); and

(b) granting such other and further relief as to this Court may seem just and proper.

A proposed order is attached.

Dated: New York, New York
September 7, 2021

DUNNEGAN & SCILEPPI LLC

By 
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